

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Mahmoud KHALIL,

*Petitioner,*

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

*Respondents.*

Case No. 25-cv-01935

**DECLARATION OF VERONICA R. SALAMA**

I, Veronica R. Salama, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. My name is Veronica R. Salama. I am a licensed attorney in good standing in the state of New York. I am an attorney of record in the above-captioned case.
2. I represent the petitioner, Mahmoud Khalil, in this action.
3. Mr. Khalil is currently detained by ICE at the LaSalle Detention Center in Jena, Louisiana, and I am unable to travel to him.
4. On March 13, 2025, I met with Mr. Khalil in a virtual attorney-client meeting. We reviewed the substance of the amended petition, and he confirmed the accuracy of the facts therein as they pertain to him.
5. I hereby verify that the factual statements in the amended petition in this action (ECF No. 38) as they pertain to Mr. Khalil are true and correct to the best of my knowledge.

Executed on March 14, 2025  
New York, New York



Veronica R. Salama  
Staff Attorney  
New York Civil Liberties Union Foundation